

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BRITAX CHILD SAFETY, INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 5-17-cv-02724
v.)	
)	
NUNA INTERNATIONAL B.V. and)	
NUNA BABY ESSENTIALS, INC.,)	
)	
Defendants.)	

**UNOPPOSED MOTION TO FILE UNREDACTED REPLY IN SUPPORT OF
PLAINTIFF BRITAX CHILD SAFETY, INC.’S MOTION TO STRIKE EXPERT
WITNESS DISCLOSURES UNDER SEAL**

Pursuant to Local Civil Rule 5.1.5, Your Honor’s Policies and Procedures, and the Stipulated Protective Order in this case (Dkt. No. 66), Plaintiff Britax Child Safety, Inc. (“Plaintiff” or “Britax”) respectfully moves this Court for an order granting leave for Plaintiff’s Reply Brief in Support of its Motion to Strike Expert Witness Disclosures to be filed under seal. Defendants Nuna International B.V. and Nuna Baby Essentials, Inc. (“Defendants” or “Nuna”) do not oppose this motion. The following table identifies each document (or portion thereof) that is sought to be sealed:

Document	Page(s) Sought to be Sealed
Reply in Support of Plaintiff Britax Child Safety, Inc.’s Motion to Strike Expert Witness Disclosures	5

In support of this Motion, Britax submits herewith the accompanying Memorandum in Support of Plaintiff Britax Child Safety, Inc.’s Motion for Leave, Certificate of Concurrence, and Redacted Version of Plaintiff’s Reply in Support of Motion to Strike Expert Witness Disclosures.

Dated: June 26, 2020

Respectfully submitted,

/s/ Kasey E. Koballa

KILPATRICK TOWNSEND & STOCKTON LLP

Chris W. Haaf (PA Bar No. 307481)
N. Dean Powell, Jr.
Jonathan E. Harris
1001 West Fourth Street
Winston-Salem, NC 27101
Telephone: (336) 607-7300
Facsimile: (336) 607-7500
chaaf@kilpatricktownsend.com
dpowell@kilpatricktownsend.com
jeharris@kilpatricktownsend.com

Kasey E. Koballa
4208 Six Forks Road, Suite 1400
Raleigh, NC 27609
Telephone: (202) 639-4713
Facsimile: (202) 508-5858
kkoballa@kilpatricktownsend.com

Steven D. Moore
Two Embarcadero Center, Eighth Floor
San Francisco, CA 94111
Telephone: (415) 576-0200
Facsimile: (415) 576-0300
smoore@kilpatricktownsend.com

MYERS, BRIER & KELLY, LLP

Daniel T. Brier (PA ID 53248)
Suzanne P. Conaboy (PA ID 314036)
425 Spruce Street, Suite 200
Scranton, PA 18503
Telephone: (570) 342-6100
dbrier@mbklaw.com
sscanlon@mbklaw.com

CERTIFICATE OF CONCURRENCE

I, Kasey E. Koballa, certify that I requested Defendants' concurrence in Unopposed Motion to File Unredacted Reply in Support of Plaintiff Britax Child Safety, Inc.'s Motion to Strike Expert Witness Disclosures Under Seal, and Defendants do not oppose this motion.

/s/ Kasey E. Koballa
Kasey E. Koballa

CERTIFICATE OF SERVICE

I hereby certify that June 26, 2020, a true and correct copy of the foregoing
**UNOPPOSED MOTION TO FILE UNREDACTED REPLY IN SUPPORT OF
PLAINTIFF BRITAX CHILD SAFETY, INC.'S MOTION TO STRIKE EXPERT
WITNESS DISCLOSURES UNDER SEAL** was electronically filed with the Clerk of Court
using the CM/ECF system, which will automatically send email notification of the filing to
counsel of record.

/s/ Kasey E. Koballa
Kasey E. Koballa